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June 1, 2001

Ex Parte Presentation

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Application by Southwestern Bell for Provision of In-Region, InterLATA Services in Missouri,* CC Docket No. 01-88

Dear Ms. Salas:

On behalf of SBC Communications Inc. ("SBC") and at the request of FCC staff, I am enclosing a verified response to some of the questions that were raised in a conference call on May 22, 2001. The issues addressed in the enclosed response relate to the loop maintenance operations system.

Pursuant to the Commission's rules governing ex parte communications, I am enclosing two copies of this letter. Please file stamp and return the additional copy. Thank you for your kind assistance in this matter.

Sincerely,

Geoffrey M. Klineberg

Enclosure

cc: Tom Navin
Uzoma Onyeije
Gary Remondino
Layla Seirafi
Dana Joyce
ITS

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Correction of the Embedded Base

1. In response to Staff's request for additional detail on correction of the embedded base of LMOS UNE-P records with sequencing errors, SBC provides the following:

2. On UNE-P accounts, LMOS records are updated with account information taken from the "C" order, which is transmitted from Customer Access Billing System (CABS) after posting. CABS is the only data source utilized by LMOS for UNE-P record information. Accordingly, in order to assess the impact of out-of-sequence posting on the LMOS database, SWBT undertook to compare the UNE-P records in the CABS database with the LMOS database records for the same telephone numbers.

3. First, LMOS personnel provided specifications to the CABS programmers for the extraction of a data file of all UNE-P CABS records (identified by class of service, Universal Service Order Code (USOC), and Field Identifier (FID)). Using these criteria, the CABS team produced a data file of all UNE-P CABS accounts. For each account, the CABS data file contained the data fields that are necessary for electronic trouble reporting and the tracking of performance measurement data.[1]

4. LMOS programmers then wrote routines to compare the CABS data with the LMOS data and to identify those UNE-P records that were working (i.e., being billed) in CABS, but were in disconnected status in LMOS. This "working/disconnected" discrepancy between the databases indicated that the D and C orders had not posted to LMOS in the correct sequence.[2] Additional programs were then used to change the LMOS record from disconnected to working status and update the fields with the associated CABS data for that record. The updating of these fields restored the embedded base of LMOS records to the correct condition for the opening of electronic trouble reports and the tracking of data for PM purposes.

5. For the MOKA states, the CABS file was pulled and the update was completed on May 9. The corrected database was made available for MOKA trouble reporting purposes on May 10. For Texas, the CABS file was pulled and the update was completed on May 10.[3] The

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[1] The data for these fields are normally provided to LMOS via the posted C order, and include the CABS Billing Account Number and Customer Code, the CLEC Master Customer Number (MCN), the Subscriber Name and Service Address, and class of service.

[2] As explained in the LMOS Joint Affidavit, in an "out-of-sequence" situation, the C order attempts to post first to LMOS, finds a working account, and errors out to the LDRC for manual handling. The D order then follows, placing the LMOS record into disconnected status.

[3] A very small number of the records reflected in the "Total LMOS Records Disconnected/Working in CABS" column of Attachment A were manually updated by the LDRC in the regular course of business on May 10.

corrected database was made available for Texas trouble reporting purposes on May 11. Exhibit 1 to this letter is a spreadsheet containing details of the update.[4]

6. In connection with reviewing its update process in preparation of this letter, SWBT discovered that the records in its CABS extract included a small number of conditioned UNE loop and switch-port combinations (3,475 records – 0.27% of the total number of records extracted from CABS).[5] Conditioned loops are not inventoried in LMOS for trouble report processing. The FID for conditioned loop and port combinations (NC_SPSC) was inadvertently included in the criteria for the CABS extract.

7. Although conditioned UNE loop and port combinations are not inventoried in LMOS for trouble reporting purposes,[6] LMOS retains records for all SWBT 10-digit telephone numbers that have been disconnected for any reason, including conversion to a CLEC providing services that are not inventoried in LMOS for trouble report processing. Because these records reflect a "disconnected" status in LMOS, the data they contain (relating to the account in place at the time the record was disconnected) is inactive.[7] Such records exist in LMOS for conditioned UNE loop and port combinations.

8. Accordingly, when SWBT updated the disconnected LMOS records with information from the CABS data file, these conditioned loop and port combinations were incorrectly included in the update. SWBT plans to rectify this error next week, by returning these records to disconnected status in LMOS. These trunks are not reflected in either the "Total CABS UNE-P Records" or "Total LMOS Records Disconnected/Working in CABS" columns on Attachment A.

9. Upon making this discovery, SWBT reexamined its CABS data pull to ensure that, with the exclusion of the conditioned loop and port combinations, only UNE-P records were included. At this time, SWBT realized that 897 additional records included in the CABS data extract had partial or missing FIDs. Because all these records reflected the correct class of service for UNE-P (even though the related FIDS could not be confirmed with certainty), SWBT intends to leave any of these records that may have been updated in that status. This ensures that, to the extent any of these records may have sustained a sequencing error in the past, the record is now correctly reflected in LMOS. However, for purposes of Exhibit 1, SWBT

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[4] At ¶ 29 of the LMOS Joint Affidavit, SBC described the manual fax process instituted by the LOC and LDRC to expedite the update of the LMOS database on those occasions when the CLEC advised that it had been unable to open an electronic trouble report. Approximately 5000 faxes have been sent by the LOC to the LDRC since January 2001, accounting for less than 0.39% of the total UNE-P records billed in CABS. If these records had not been updated manually, and if all had sustained a sequencing error, they would have increased the overall percentage of LMOS records with a sequencing error from 9.24% to 9.63%. See Exhibit 1.

[5] Services that are provided by such combinations include trunks associated with a 10-digit telephone number, such as PBX and DID trunks.

[6] Instead, such combinations are special circuits that are inventoried in SWBT's Work and Force Administration/Control (WFA/C) system for trouble reporting purposes. See, LMOS Joint Affidavit, fn. 8.

[7] LMOS retains these records until such time as the telephone number is reassigned to a service type inventoried in LMOS for trouble reporting purposes.

removed the 897 records from the "Total CABS UNE-P Records" column. This has the effect of increasing (albeit slightly) the number that appears in the "% Updated" column. The update process will be refined to account for these issues for any future CABS/LMOS UNE-P record comparisons.[8]

10. In its May 24th ex parte, AT&T complains that SWBT's correction of the embedded base of LMOS records is an "eleventh hour assertion," citing to the comments filed by SWBT with the Texas PUC on April 19, 2001. Contrary to the misstatements contained in AT&T's letter, in its comments SWBT advised the Texas Commission that:

> SWBT is evaluating a means by which the embedded base of CLEC end users can be verified and updated in LMOS with the accurate line record information. SWBT is still assessing a mechanized approach for performing the embedded base verification and is unable to provide a date for correcting any discrepancies, but commits to provide Staff with an update on the status of this effort in the near future.[9]

11. On May 17th, SWBT updated the Texas Commission staff on the status of the correction of the LMOS embedded base by filing a copy of the Joint Affidavit, and providing a copy to all parties of record to the six month performance review.

12. As set out above, the process for electronically correcting the out-of-sequence records was difficult and technically complicated. An approach had to be developed to identify the error in question; programs had to be written to identify and pull specific data out of two computer systems, each of which contain massive numbers of records. Additional programs were required to update the disconnected LMOS records with the required information from CABS. Personnel familiar with these systems were required to evaluate the problem and determine whether the proposed solution would be effective.

Manual Trouble Tickets

13. AT&T's Declaration of Walter Willard argues that the manual process initially proposed by SWBT to update the embedded base of LMOS records on a case-by-case basis would take up to 48 hours per record, thereby delaying the repair of a reported trouble due to inaccuracies in the database.[10]

14. First, there is no delay in manual trouble ticket processing as a result of inaccuracies in the LMOS record. SWBT does not and has not waited for the LMOS database to be updated before beginning to work on a trouble report. Rather, as noted in the Joint Reply Affidavit, as long as a CLEC does not delay in submitting a manual report, it should receive the same

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[8] See LMOS Joint Affidavit at n. 18.

[9] Southwestern Bell's Comments Concerning Issues Raised During the Second Six Month Review, Section 271 Compliance Monitoring of Southwestern Bell Telephone Company of Texas, Project No. 20400 (Texas PUC filed Apr. 19, 2001), p. 6.

[10] Declaration of Walter Willard ¶ 22.

commitment time for repair that would have been received if the report had been submitted electronically.[11]

15. Although not specifically raised as an issue by AT&T, in one of the e-mails attached as an exhibit to the Declaration of Walter Willard, filed on April 24th, AT&T asked whether it was "standard practice" to limit inquiries for the status on trouble tickets to two per call. The answer to that question is "yes." It has been the policy of the LOC Call Center for more than 2 1/2 years to provide status on no more than two tickets per call. This prevents the LOC Call Center representatives from being tied up on one call with a single CLEC making inquiries into the status of an unlimited number of trouble tickets.

16. It also is the LOC policy is to take manual trouble reports from CLEC callers for no more than 2 accounts per call.[12] The purpose of this policy is to ensure that CLECs report troubles to SWBT as they occur, just as SWBT's retail customers do. If CLECs were permitted instead to submit manual trouble reports on a batch basis, SWBT's ability to ensure that CLECs receive repair commitments that are comparable to those given to SWBT's retail customers would be adversely affected.

Service Order Posting

17. As noted in paragraphs 37 and 38 of the LMOS Joint Affidavit, the potential impact of delays in service order posting on SWBT's maintenance and repair systems are described for the CLECs in the Maintenance and Repair and Trouble Reporting sections of the CLEC Handbook. Even when properly sequenced, there can be a lag between posting of the D and C orders to LMOS that may require the CLEC to submit a trouble report manually rather than electronically.

18. If service orders contain errors that prevent them from posting to the CABS or Customer Record Information System (CRIS) billing systems, they will fall out for handling by the Local Service Center (LSC) Posting Order Service Team (POST).[13] This team is responsible for clearing errors that prevent completed service orders from posting to the billing systems. SWBT's posting performance is measured by Performance Measurement 17.1 (Service Order Posting). For March and April of this year, PM 17.1 results reflect that 90% of service orders post to the CABS and CRIS billing systems within 3 business days, with more than 98% posting within 5 business days. As mentioned in the Joint Affidavit, the LMOS line records are updated nightly during the business week to reflect new service order activity, including any transfer of service from one local provider to another.

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[11] See LMOS Joint Affidavit at n. 5, ¶ 26.

[12] Each account may include multiple telephone numbers, and could result in multiple trouble tickets per account.

[13] Noland Aff. ¶ 46.

Birch Follow-up

19. At footnote 17 of the LMOS Joint Affidavit, SBC advised that it was continuing to investigate 16 of the 24 telephone numbers submitted by Birch, in order to determine why Birch received an indication that the records had not been updated in LMOS.

20. The e-mail from Birch containing the list of 24 telephone numbers was sent to SWBT's LOC on May 2nd with a request that SWBT validate "if these records are or are not updated in LMOS." The LOC representative who received the e-mail forwarded it to the LDRC for investigation, after determining that 8 of the numbers related to special circuits. These special circuits should have been accessed in TBTA in a CKID (circuit identification) format versus the TN (telephone number) format to establish a trouble ticket.

21. The LDRC corrected the LMOS records associated with the remaining 16 telephone numbers, but the LDRC personnel did not understand that they were also supposed to investigate how these particular records came to be incorrect. In other words, the LDRC did what it is supposed to do - i.e., correct LMOS records - without first ascertaining why the particular Birch records were inaccurate in the first place. Currently, all of these numbers are accurately updated in LMOS.

22. Although SWBT will not be able to provide any further analysis on the telephone numbers submitted by Birch, SWBT has requested and received from AT&T a complete list of the telephone numbers which it claims were not correctly updated in LMOS.[14] SWBT will provide its analysis of those numbers together with its reply to AT&T's May 24th ex parte.

Performance Measurement Update

23. In connection with Staff's request for additional detail on SWBT's update to the embedded base of "out-of-sequence" LMOS UNE-P records, SWBT's LMOS group developed Exhibit 1, which was circulated for the first time on Tuesday, May 29th. While the LMOS group was aware that the CABS UNE-P numbers, and the "Disconnected in LMOS/Working in CABS" numbers could be broken down on a state specific basis, they were unaware that such information could impact the analysis conducted by SWBT's performance measurement group. Because all prior discussion regarding the embedded base update had been in terms of a SWBT total, the performance measurement group did not recognize that state-specific percentages were available.

24. Upon circulation of Exhibit 1, the performance measurement group recognized that the LMOS Historical Analysis (Attachment C to the Joint Affidavit) should have been calculated based on the actual percentage of sequencing errors for Missouri.

25. Similarly, upon review of the state-specific numbers, the performance measurement group recognized that one of the assumptions underlying its original analysis was incorrect. Because the PM base is taken from UNE-P lines in service as reported in CABS, lines that

[14] This includes the 22 telephone numbers referenced in ¶ 4 of the Reply Declaration of Walter Willard, and the 31 telephone numbers referenced in AT&T's May 24th ex parte.

were disconnected in LMOS would not have affected the PM base. Accordingly, the base should not have been increased by the percentage of lines affected by an out-of-sequence condition in LMOS.

26. SWBT has revised Attachment C to the Joint Affidavit to account for these factors. See Exhibit 2 to this letter. Exhibit 3 to this letter contains PM results for Texas, Kansas, Oklahoma and Arkansas recalculated according to the same set of assumptions.

27. In paragraph 49 of the LMOS Joint Affidavit, SWBT stated: "The results of this analysis indicate that there would have been no change in the outcome of the performance measurement results (i.e. parity to out of parity) with the minimal exception of March 2001 for PM 35-12 (No Field work) and PM 41-03 (UNE-P)." The revised analysis contained in Exhibit 2 requires a revision of paragraph 49. The results of the revised analysis indicate there would have been a change in the outcome of the performance measurement results (i.e., parity to out-of-parity) for PM 35-11 for June 2000, January 2001, and March 2001, PM 35-12 for January 2001 and March 2001 and PM 41-03 for March 2001. That is, of the seven PMs that SWBT recalculated, over a twelve-month period, only four additional results (of 84 possible) changed from parity to out of parity.

28. For the months in question, in most cases the addition of a few trouble reports resulted in the out of parity condition. This out of parity condition is not indicative of an ongoing problem with UNE-P installations. Because these measures compare UNE-P performance to the retail trouble report rate, the volumes of orders being compared are significantly different. For example, the number of SWBT retail orders for PM 35-12 in March 2001 is more than 70 times the CLECs 2,471 orders.

29. Because of the difference in volumes, the likelihood of a parity miss as measured by the Z calculation is greater whenever the CLEC trouble report rate is higher than the retail level. For example, even though the average trouble report rate in PM 35-12 for the CLECs increased only to 2.2% from 1.6% with the LMOS restatement, the Z calculation now shows that SWBT missed parity for an additional two months. This parity difference in just two months is unlikely to have had an effect on competition in the Missouri local exchange market.

I verify under penalty of perjury that the foregoing paragraphs 2-9, 12, and 21-23 are true and correct.

Executed on June 1, 2001.

Daniel J. Coleman
General Manager—Repair Systems Support –
Network Services Staff

I verify under penalty of perjury that the foregoing paragraphs 18, and 23-29 are true and correct.

Executed on June 1, 2001.

William R. Dysart

William R. Dysart
DIRECTOR-PERFORMANCE

I verify under penalty of perjury that the foregoing paragraphs 10-11, 17-18 and 22 are true and correct.

Executed on 6-1, 2001.

Brian Noland

Brian Noland
DIRECTOR-REGULATORY SUPPORT

I verify under penalty of perjury that the foregoing paragraphs 5, 14-16 and 20 are true and correct.

Executed on June 1, 2001.

David R. Smith
ASSOCIATE DIRECTOR-REGULATORY

ORIGINAL

STATE OR AREA	TOTAL CABS UNE-P RECORDS	TOTAL RECORDS WORKING IN CABS / DISCONNECTED IN LMOS	TOTAL LMOS RECORDS PLACED IN WORKING STATUS & UPDATED AS OF 5/11	PERCENT UPDATED
DALLAS	318,326	26,011	26,011	8.17%
HOUSTON	359,188	21,658	21,658	6.03%
SAN ANTONIO	467,372	31,224	31,224	6.68%
TEXAS TOTAL	**1,144,886**	**78,893**	**78,893**	**6.89%**
MISSOURI	54,523	12,760	12,760	23.40%
KANSAS	51,060	21,012	21,012	41.15%
ARKANSAS	5,769	4,162	4,162	72.14%
OKLAHOMA	21,316	1,243	1,243	5.83%
MOKA TOTAL	**132,668**	**39,177**	**39,177**	**29.53%**
SWBT TOTAL	**1,277,554**	**118,070**	**118,070**	**9.24%**

LMOS HISTORICAL ANALYSIS

Subsequent to SWBT's LMOS analysis filed in the Joint LMOS affidavit, additional information was provided to SWBT's Performance Measurements Group breaking down the LMOS understatement by state. That additional information demonstrated that, although a 10% understatement accurately represented the region-wide understatement, it was not an accurate representation of the state-by-state understatement, as shown below. In addition, the previous analysis was predicated on the assumption that the base of UNE-P lines reported in PM 37 "Trouble Report Rate" was understated by 10%. After reviewing the individual state data, it was determined that the base of lines in PM 37 was accurate since the line count for UNE-P is obtained from the CABS billing system not LMOS. SWBT has revised its analysis based on this new information. The following assumptions were used in this analysis:

- The following table reflects the embedded UNE-P base by state, revealed through the comparison of LMOS and CABS records for UNE-P accounts, that was utilized to estimate the number of total UNE-P lines affected by the out-of-sequence problem.

STATE	TOTAL CABS UNE-P RECORDS	TOTAL RECORDS WORKING IN CABS / DISCONNECTED IN LMOS	TOTAL LMOS RECORDS PLACED IN WORKING STATUS & UPDATED AS OF 5/11	PERCENT UPDATED
TEXAS TOTAL	1,144,886	78,893	78,893	6.89%
MISSOURI	54,523	12,760	12,760	23.40%
KANSAS	51,060	21,012	21,012	41.15%
ARKANSAS	5,769	4,162	4,162	72.14%
OKLAHOMA	21,316	1,243	1,243	5.83%
SWBT TOTAL	**1,277,554**	**118,070**	**118,070**	**9.24%**

- SWBT recalculated the report rate for PM 37 based on the estimated number of lines that would have been reflected in LMOS based on the chart above. This new report rate was used to calculate the total estimated trouble reports. The actual number of trouble reports was estimated by adjusting the reported number of trouble reports by the reciprocal of 1 minus the error %. For example: In Missouri for the month of March 2001 PM 37-03 reported 572 trouble reports for 50,653 lines. 572 is the correct number of reports for the lines shown in LMOS, which we know is understated by 23.40%, as compared to the 50,653 lines drawn from CABS. Assuming the same undercount rate for the trouble reports, we can adjust the value of 572 by 1/(1-0.2340), *i.e.*

  Adjusted Trouble Reports = Reported trouble reports/(1-0.2340) = 572/0.7660 = 746.74 (approx. 747)

- SWBT further assumed that trouble reports for the affected lines were not captured in the performance measurements as trouble reports for any CLEC (whether or not the correct CLEC). Rather, SWBT assumed that those trouble reports were misidentified as SWBT retail trouble reports. This is an extremely conservative estimate since some misidentified trouble reports may have been associated with CLEC to CLEC migrations. To the extent that a trouble report was assigned to the wrong CLEC, the aggregate CLEC trouble report rate would still be correct.

- PM 37 reports CLECs' total trouble reports, while PM 35 ("Percent POTS/UNE-P Trouble Report within 10 Days (I-10) of Installation"), PM 37.1 ("Trouble Report Rate Net of Installation and Repeat Reports"), and PM 41 ("Percent Repeat Reports") are subsets of PM 37. Therefore, the additional trouble reports in PM 37 estimated by the analysis described above will also appear in PMs 35, 37.1, and 41. Consistent with the above assumptions, SWBT allocated these additional trouble reports in the same proportion as was originally reported for those PMs. Based on the conservative assumptions detailed above, this increased the CLEC UNE-P trouble reports captured in the performance measurements by about 31 percent. SWBT then decreased the number of retail trouble reports for PMs 35, 37, 37.1, and 41 by the same amount that it increased the CLEC trouble reports. Based on the new data, SWBT then recalculated the z-value for each of these performance measurements.

- As before, SWBT did not recalculate data for Missed Repair Commitments (PM 38), Receipt to Clear Duration (PM 39), and Percent Out of Service Less Than 24 Hours (PM 40). Nothing in the new data received contradicted SWBT's previous assumption that the results for these performance measurements would not be affected by the recalculation of trouble report data captured in PMs 35, 37, 37.1 and 41. The out-of-sequence problem should not have affected how the trouble report itself was handled, or the speed with which the trouble was resolved. Therefore, there is no reason to believe that the duration or the missed commitments would be different for lines affected by the out-of-sequence problem than for unaffected lines.

As can be seen from the data attached, there was only minimal impact on the results reported for Missouri. PM 35-11 for June 2000, January 2001 and March 2001, PM 35-12 for January and March 2001 and PM 41-03 for March 2001 shifted from in parity to out of parity.[1] For those months, in most cases the addition of a few trouble reports resulted in the out of parity condition.

[1] PM 35-11 in June 2000 increased from 8 to 10 trouble reports, in January 2001 increased from 12 to 16, and in March 2001 increased from 14 to 18. PM 35-12 in January 2001 increased from 41 to 54 and in March from 42 to 55. PM 41-03 in March 2001 increased from 68 to 89.

Percent Trouble Reports on N and T Orders within 10 days
Field Work (Original Data)

Measurement		All CLECs		SWBT	
35 - 09	No. of Orders	# Trouble Reports	% Trouble Reports	% Trouble Reports	Z-Value
Apr-00	0	0	n/a	4.08%	n/a
May-00	0	1	n/a	3.73%	n/a
Jun-00	0	0	n/a	4.00%	n/a
Jul-00	0	0	n/a	3.99%	n/a
Aug-00	0	0	n/a	3.98%	n/a
Sep-00	0	0	n/a	4.28%	n/a
Oct-00	0	0	n/a	3.41%	n/a
Nov-00	0	0	n/a	3.36%	n/a
Dec-00	0	1	n/a	3.50%	n/a
Jan-01	0	0	n/a	2.97%	n/a
Feb-01	0	0	n/a	4.12%	n/a
Mar-01	0	0	n/a	3.83%	n/a

Percent Trouble Reports on N and T Orders within 10 days
(Revised Data) Field Work

Measurement		All CLECs		SWBT	
35 - 09	No. of Orders	# Trouble Reports	% Trouble Reports	% Trouble Reports	Z-Value
Apr-00	0	0	n/a	4.08%	n/a
May-00	0	1	n/a	3.73%	n/a
Jun-00	0	0	n/a	4.00%	n/a
Jul-00	0	0	n/a	3.99%	n/a
Aug-00	0	0	n/a	3.98%	n/a
Sep-00	0	0	n/a	4.28%	n/a
Oct-00	0	0	n/a	3.41%	n/a
Nov-00	0	0	n/a	3.36%	n/a
Dec-00	0	1	n/a	3.50%	n/a
Jan-01	0	0	n/a	2.97%	n/a
Feb-01	0	0	n/a	4.12%	n/a
Mar-01	0	0	n/a	3.83%	n/a

Percent Trouble Reports on N and T Orders within 10 days

No Field Work (Original Data)

Measurement		All CLECs		SWBT	
35 - 10	No. of Orders	# Trouble Reports	% Trouble Reports	% Trouble Reports	Z-Value
Apr-00	0	1	n/a	5.59%	n/a
May-00	0	0	n/a	4.52%	n/a
Jun-00	0	0	n/a	5.29%	n/a
Jul-00	0	1	n/a	5.76%	n/a
Aug-00	0	0	n/a	6.16%	n/a
Sep-00	0	0	n/a	6.24%	n/a
Oct-00	0	0	n/a	5.20%	n/a
Nov-00	0	0	n/a	5.16%	n/a
Dec-00	0	0	n/a	5.25%	n/a
Jan-01	0	0	n/a	4.63%	n/a
Feb-01	0	1	n/a	5.53%	n/a
Mar-01	0	0	n/a	5.41%	n/a

Percent Trouble Reports on N and T Orders within 10 days

No Field Work (Revised Data)

Measurement		All CLECs		SWBT	
35 - 10	No. of Orders	# Trouble Reports	% Trouble Reports	% Trouble Reports	Z-Value
Apr-00	0	1	n/a	5.59%	n/a
May-00	0	0	n/a	4.52%	n/a
Jun-00	0	0	n/a	5.29%	n/a
Jul-00	0	1	n/a	5.76%	n/a
Aug-00	0	0	n/a	6.16%	n/a
Sep-00	0	0	n/a	6.24%	n/a
Oct-00	0	0	n/a	5.20%	n/a
Nov-00	0	0	n/a	5.16%	n/a
Dec-00	0	0	n/a	5.25%	n/a
Jan-01	0	0	n/a	4.63%	n/a
Feb-01	0	1	n/a	5.53%	n/a
Mar-01	0	0	n/a	5.41%	n/a

Percent Trouble Reports on C Orders within 10 days

Field Work (Original Data)

Measurement		All CLECs		SWBT	
35 - 11	No. of Orders	# Trouble Reports	% Trouble Reports	% Trouble Reports	Z-Value
Apr-00	140	13	9.29%	2.68%	4.49
May-00	197	5	2.54%	2.59%	-0.04
Jun-00	166	8	4.82%	3.28%	1.08
Jul-00	163	3	1.84%	2.89%	-0.79
Aug-00	194	6	3.09%	2.89%	0.16
Sep-00	212	13	6.13%	3.53%	1.95
Oct-00	201	16	7.96%	3.05%	3.73
Nov-00	234	4	1.71%	3.54%	-1.49
Dec-00	202	5	2.48%	2.80%	-0.27
Jan-01	330	12	3.64%	2.46%	1.29
Feb-01	244	15	6.15%	3.82%	1.77
Mar-01	270	14	5.19%	3.96%	0.98

Percent Trouble Reports on C Orders within 10 days

Field Work (Revised Data)

Measurement		All CLECs		SWBT	
35 - 11	No. of Orders	# Trouble Reports	% Trouble Reports	% Trouble Reports	Z-Value
Apr-00	140	17	12.14%	2.54%	6.52
May-00	197	7	3.55%	2.52%	0.88
Jun-00	166	10	6.02%	3.22%	1.96
Jul-00	163	4	2.45%	2.86%	-0.30
Aug-00	194	8	4.12%	2.84%	1.04
Sep-00	212	17	8.02%	3.41%	3.46
Oct-00	201	21	10.45%	2.88%	5.75
Nov-00	234	5	2.14%	3.51%	-1.11
Dec-00	202	7	3.47%	2.72%	0.62
Jan-01	330	16	4.85%	2.34%	2.75
Feb-01	244	20	8.20%	3.62%	3.47
Mar-01	270	18	6.67%	3.83%	2.26

Percent Trouble Reports on C Orders within 10 days
No Field Work (Original Data)

Measurement		All CLECs		SWBT	
35 - 12	No. of Orders	# Trouble Reports	% Trouble Reports	% Trouble Reports	Z-Value
Apr-00	1,218	28	2.30%	1.08%	4.08
May-00	1,443	10	0.69%	1.20%	-1.77
Jun-00	1,376	32	2.33%	1.38%	2.97
Jul-00	1,199	25	2.09%	1.47%	1.78
Aug-00	1,484	33	2.22%	1.45%	2.50
Sep-00	1,304	32	2.45%	1.48%	2.89
Oct-00	1,863	42	2.25%	1.23%	3.98
Nov-00	1,966	21	1.07%	1.22%	-0.63
Dec-00	2,458	25	1.02%	1.17%	-0.69
Jan-01	3,398	41	1.21%	1.10%	0.62
Feb-01	2,391	38	1.59%	1.68%	-0.36
Mar-01	2,471	42	1.70%	1.37%	1.42

Percent Trouble Reports on C Orders within 10 days
No Field Work (Revised Data)

Measurement		All CLECs		SWBT	
35 - 12	No. of Orders	# Trouble Reports	% Trouble Reports	% Trouble Reports	Z-Value
Apr-00	1,218	37	3.04%	1.08%	6.57
May-00	1,443	13	0.90%	1.20%	-1.04
Jun-00	1,376	42	3.05%	1.38%	5.28
Jul-00	1,199	33	2.75%	1.46%	3.70
Aug-00	1,484	43	2.90%	1.44%	4.67
Sep-00	1,304	42	3.22%	1.48%	5.18
Oct-00	1,863	55	2.95%	1.22%	6.72
Nov-00	1,966	27	1.37%	1.22%	0.61
Dec-00	2,458	33	1.34%	1.16%	0.82
Jan-01	3,398	54	1.59%	1.09%	2.78
Feb-01	2,391	50	2.09%	1.68%	1.57
Mar-01	2,471	55	2.23%	1.36%	3.69

Trouble Report Rate Less I –Reports and Repeat Reports
(Original Data)

Measurement		All CLECs		SWBT	
37.1 - 03	Number	# Trouble	Trouble	Trouble	Z-Value
	of Lines	Reports	Report Rate	Report Rate	
Apr-00	16,566	112	0.68%	1.57%	-9.21
May-00	19,590	170	0.87%	2.25%	-13.01
Jun-00	22,667	203	0.90%	2.59%	-16.00
Jul-00	25,265	218	0.86%	2.46%	-16.33
Aug-00	29,671	283	0.95%	2.35%	-15.66
Sep-00	31,881	240	0.75%	1.84%	-14.30
Oct-00	35,220	320	0.91%	1.77%	-12.14
Nov-00	37,807	260	0.69%	1.50%	-12.82
Dec-00	42,506	279	0.66%	1.25%	-10.84
Jan-01	46,009	359	0.78%	1.48%	-12.30
Feb-01	48,245	397	0.82%	1.78%	-15.71
Mar-01	50,653	448	0.88%	1.62%	-12.96

Trouble Report Rate Less I-Reports and Repeat Reports
(Revised Data)

Measurement		All CLECs		SWBT	
37.1 - 03	Number	# Trouble	Trouble	Trouble	Z-Value
	of Lines	Reports	Report Rate	Report Rate	
Apr-00	18070	146	0.81%	1.37%	-6.52
May-00	21415	222	1.04%	1.94%	-9.52
Jun-00	24461	265	1.08%	2.20%	-11.89
Jul-00	26878	285	1.06%	2.13%	-12.07
Aug-00	29671	370	1.25%	2.35%	-12.48
Sep-00	31881	313	0.98%	1.84%	-11.37
Oct-00	35220	418	1.19%	1.77%	-8.24
Nov-00	37807	340	0.90%	1.49%	-9.48
Dec-00	42506	364	0.86%	1.24%	-7.15
Jan-01	46009	468	1.02%	1.48%	-8.12
Feb-01	48245	518	1.07%	1.78%	-11.62
Mar-01	50653	585	1.15%	1.62%	-8.17

Trouble Report Rate
(Original Data)

Measurement 37 - 03	Number of Lines	All CLECs # Trouble Reports	Trouble Report Rate	SWBT Trouble Report Rate	Z-Value
Apr-00	18,070	161	0.89%	1.70%	-8.31
May-00	21,415	195	0.91%	2.34%	-13.68
Jun-00	24,461	266	1.09%	2.70%	-15.33
Jul-00	26,878	265	0.99%	2.59%	-16.33
Aug-00	29,671	356	1.20%	2.90%	-17.18
Sep-00	31,881	309	0.97%	2.30%	-15.63
Oct-00	35,220	411	1.17%	2.19%	-12.96
Nov-00	37,807	330	0.87%	1.84%	-13.82
Dec-00	42,506	359	0.84%	1.54%	-11.55
Jan-01	46,009	459	1.00%	1.79%	-12.65
Feb-01	48,245	511	1.06%	2.19%	-16.75
Mar-01	50,653	572	1.13%	2.04%	-14.28

Trouble Report Rate
(Revised Data)

Measurement 37 - 03	Number of Lines	All CLECs # Trouble Reports	Trouble Report Rate	SWBT Trouble Report Rate	Z-Value
Apr-00	18070	210	1.16%	1.70%	-5.54
May-00	21415	255	1.19%	2.34%	-11.12
Jun-00	24461	347	1.42%	2.70%	-12.32
Jul-00	26878	346	1.29%	2.59%	-13.41
Aug-00	29671	465	1.57%	2.90%	-13.63
Sep-00	31881	403	1.26%	2.30%	-12.27
Oct-00	35220	537	1.52%	2.19%	-8.47
Nov-00	37807	431	1.14%	1.84%	-10.04
Dec-00	42506	469	1.10%	1.54%	-7.25
Jan-01	46009	599	1.30%	1.79%	-7.77
Feb-01	48245	667	1.38%	2.19%	-12.01
Mar-01	50653	747	1.47%	2.03%	-8.84

Repeat Reports
(Original Data)

Measurement		All CLECs		SWBT	
41 - 03	# Trouble Reports	# Repeat Reports	% Repeat Reports	% Repeat Reports	Z-Value
Apr-00	146	7	4.79%	8.39%	-1.56
May-00	185	9	4.86%	8.73%	-1.86
Jun-00	252	23	9.13%	9.83%	-0.37
Jul-00	251	18	7.17%	9.48%	-1.25
Aug-00	338	34	10.06%	10.22%	-0.10
Sep-00	295	24	8.14%	10.03%	-1.08
Oct-00	381	33	8.66%	10.42%	-1.12
Nov-00	318	45	14.15%	9.60%	2.74
Dec-00	337	49	14.54%	9.52%	3.12
Jan-01	421	47	11.16%	8.36%	2.06
Feb-01	473	60	12.68%	10.08%	1.87
Mar-01	536	68	12.69%	10.50%	1.64

Repeat Reports
(Revised Data)

Measurement		All CLECs		SWBT	
41 - 03	# Trouble Reports	# Repeat Reports	% Repeat Reports	% Repeat Reports	Z-Value
Apr-00	190	9	4.74%	8.39%	-1.81
May-00	242	12	4.96%	8.73%	-2.08
Jun-00	329	30	9.12%	9.83%	-0.43
Jul-00	328	24	7.32%	9.49%	-1.34
Aug-00	441	44	9.98%	10.22%	-0.17
Sep-00	385	31	8.05%	10.04%	-1.29
Oct-00	498	43	8.63%	10.42%	-1.30
Nov-00	415	59	14.22%	9.59%	3.18
Dec-00	440	64	14.55%	9.50%	3.57
Jan-01	549	61	11.11%	8.35%	2.31
Feb-01	617	78	12.64%	10.07%	2.10
Mar-01	700	89	12.71%	10.50%	1.90